

ATTACHMENT TO ADTRADER v. GOOGLE

INTERROGATORY No. 1:

If YOU contend that any of the websites registered to PLAINTIFF's AdX account engaged in invalid activity or violated YOUR policies, state the date of such invalid activity or non-compliance with YOUR policies, DESCRIBE the nature of each such invalid activity or policy violation, and IDENTIFY the specific website on which the invalid activity or policy violation took place.

RESPONSE TO INTERROGATORY NO. 1:

In addition to the foregoing general objections, which Google incorporates by reference, Google specifically objects to this Interrogatory on the grounds that: (1) it includes the objectionable defined terms “IDENTIFY,” and “YOUR”; (2) it is compound, and contains multiple subparts; (3) it is vague and ambiguous as it relies on the undefined terms “DESCRIBE,” and the undefined phrase “engaged in invalid activity”; (4) it seeks information that is confidential, proprietary, or otherwise subject to trade secret protection; (5) it is premature and calls for information that Google does not possess at this stage of litigation and is only fully knowable after discovery has substantially progressed.

Subject to the foregoing General Responses, and subject to and without waiving any of its General and specific objections, Google responds to this Interrogatory as follows:

[illegible]

